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July 18, 2024

Via E-mail

Our File No.: 201798

City of Toronto Council
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Sylwia Przedziecki, City Clerk

Dear Sirs/Mesdames:

**Re: City of Toronto Council: Item No. NY15.4
1875 Steeles Avenue West - Zoning By-law Amendment and Rental Housing
Demolition and Conversion Applications - Decision Report - Approval
Land Use Compatibility**

We are counsel to Tenblock Developments Inc., (“**Tenblock**”) the management company working on behalf of Microbjo Properties Inc., the owner of the property known municipally as 1875 Steeles Avenue West (the “**Site**”) in the City of Toronto (the “**City**”).

Tenblock is proposing to redevelop an underutilized Mixed Use designated Site, that is currently improved with a 120 unit residential building, with three new residential buildings containing a total of 960 dwelling units, including 120 rental replacement units and 12 new affordable rental units, in accordance with all applicable Provincial and Municipal land use compatibility policies and guidelines.

Tenblock’s goal, working with City Staff, its neighbours and local stakeholders, including Sanofi Pasteur (“**Sanofi**”) is:

- to provide much needed housing while ensuring that the proposed development can co-exist with the existing Sanofi facility; and,
- to address the concerns raised by Sanofi to ensure that the Sanofi facility can continue to operate and expand.

Further to this goal, we request that the 1875 Steeles West applications (Item No. NY15.4) be referred back to the Director, Community Planning, North York District, for further consideration in accordance with the motion proposed by Councillor Carroll at North York Community Council.



BACKGROUND:

Since 2020, our client and its consultant team has worked closely with City staff towards intensifying the underutilized 1875 Steeles West property with an appropriate infill development. 1875 Steeles Avenue West is located on the south side of Steeles Avenue West, approximately 100 metres east of Dufferin Street. The Site is generally rectangular and has approximately 85.97 metres of frontage on Steeles Avenue West and a depth of approximately 125.1 metres. The total site area is 12,844 square metres (1.28 hectares).

The Site is occupied by an ageing 4-storey rental apartment building, containing 120 rental units, and associated surface parking. The proposed rezoning application would permit the redevelopment of the Site with three new residential buildings consisting of a mix of tall and mid-rise building forms with heights of 14 storeys (53 metres), 33 storeys (115 metres), and 39 storeys (133 metres), containing a total of 960 dwelling units, including 120 rental replacement units, 12 new affordable rental units, a public park and a publicly accessible open space (POPS).

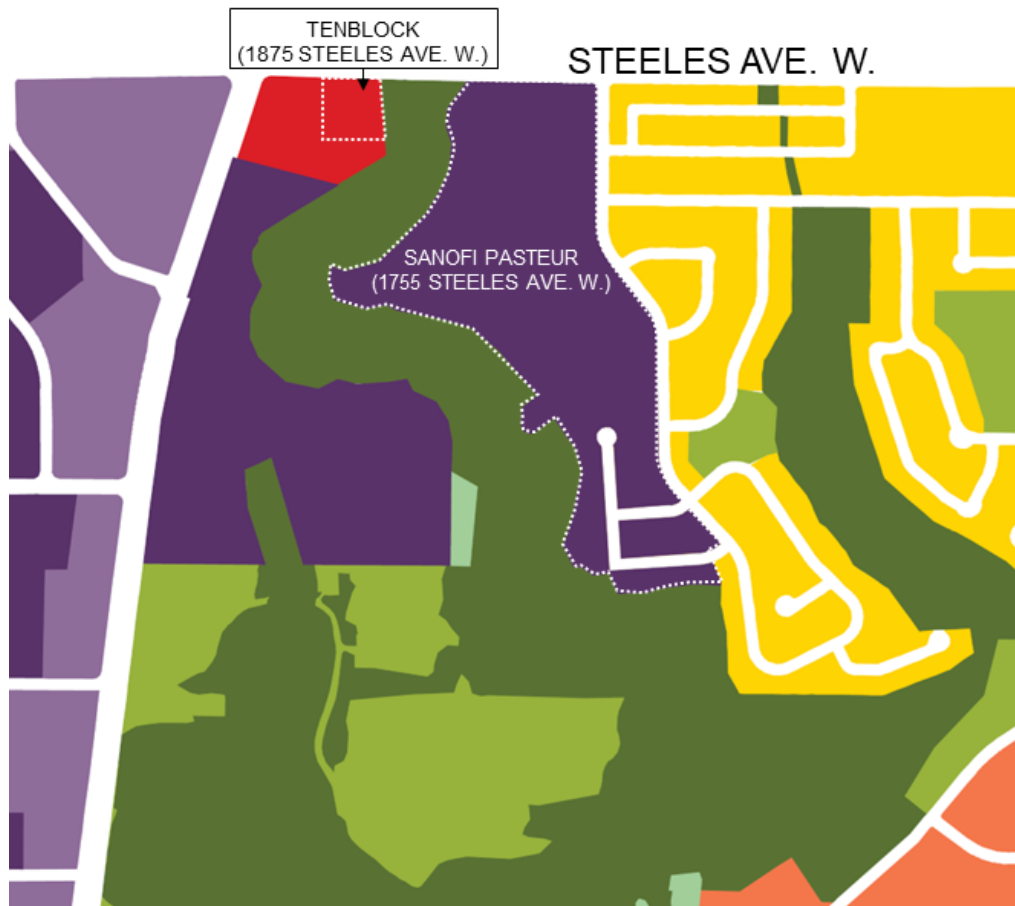
The Site is designated *Mixed Use Areas* and is zoned RM (f21.0; a835; d1.0), with a maximum lot coverage of 35%. The City's Official Plan permits the redevelopment of the Site with tall residential buildings, although a rezoning is required to increase the permitted height and density.

The adjacent property to the west of the Site, 1881 Steeles Avenue West, is currently occupied by the Dufferin Corners commercial plaza that is proposed for high-rise residential uses. The easterly, north-easterly and south-easterly portions of the subject site flank the West Don River valley, which is designated by the City of Toronto as part of the *Natural Heritage System*.

The Sanofi manufacturing and research facility is located approximately 105 metres to the east of the Site on the opposite side of the West Don River valley. The area surrounding the Sanofi complex already includes sensitive uses, such as the apartment buildings in the northeast quadrant of the intersection of Steeles Avenue and Dufferin Street, and low-rise residential neighbourhoods to the north and east of Sanofi.

The below figure extracted from City of Toronto Official Plan Land Use Plan 16 illustrates the 1875 Steeles Avenue West development site and the Sanofi lands. As noted above, the Sanofi facility is located within an area dominated by residential development including *Neighbourhoods*, *Apartment Neighbourhoods*, *Mixed Use Areas*, and *Natural Areas and Parks*, with a larger *Employment Area* including *General Employment Areas* and *Core Employment Areas* further to the west of both the Sanofi facility and 1875 Steeles Avenue West¹.

¹ We note that as confirmed by the Minister of Municipal Affairs and Housing in a letter provided to Tenblock, policies regarding Provincially Significant Employment Zones do not apply to 1875 Steeles Avenue West as it is designated *Mixed Use Areas* in the City of Toronto Official Plan. Please see the letter from the Minister to Peter Smith of Bousfields attached as Schedule "A" to this letter.



In addition, as illustrated in the Block Context Plan prepared by Bousfields and attached to this letter as Schedule “B”, the redevelopment of 1875 Steeles West and 1881 Steeles West, on lands that are currently designated *Mixed Use Areas* in the City’s Official Plan, are anticipated to contribute approximately 2,098 housing units (of which approximately 1,978 will be net new housing units) and over 169,000 square metres of residential gross floor area in close proximity to York University and to excellent employment opportunities for a diverse workforce.

LAND USE COMPATIBILITY:

As noted above, Tenblock’s goal is to provide much needed housing while ensuring that the proposed development can co-exist with the existing Sanofi facility. To that end, Tenblock and its consultants have undertaken an extensive review of the applicable land use compatibility policies and requirements of the Provincial Policy Statement (“**PPS**”), the Growth Plan for the Greater Golden Horseshoe (2020), the City’s Official Plan and NPC-300, the applicable Ministry Environmental Noise Guideline – Stationary and Transportation Sources – Approval and Planning (“**NPC-300**”).



The October 30, 2020 Planning Rationale Report, prepared by Bousfields Inc. (“**Bousfields**”), and the subsequent addendum dated December 7, 2023 contain a detailed overview of the land use compatibility policies contained within the PPS, the Growth Plan and the Official Plan that are applicable to the proposed redevelopment of the Site.

Further, Gradient Wind Engineering Inc. (“**Gradient**”) undertook a land use compatibility assessment and air quality analysis for the proposed development and prepared a Stationary Noise Assessment, Detailed Air Quality Study, and a Compatibility and Mitigation Study (all dated August 22, 2023) to evaluate air quality, stationary noise and transportation noise and vibration impacts (the “**Gradient Compatibility Reports**”).

Bousfields’ provided planning commentary to indicate how the Gradient Compatibility and Mitigation Study has addressed the policies and guidelines both at a Provincial and Municipal Level in a further letter dated, December 7, 2023. The Bousfields’ letter concludes that:

- the Compatibility/Mitigation Study demonstrates consistency/conformity with the applicable policies in the Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe; and,
- the Compatibility/Mitigation Study demonstrates conformity with the applicable policies in the Official Plan.

A copy of the December 7, 2023 letter is attached as Schedule “C” to this Letter.

PEER REVIEW PROCESS:

In accordance with City practice, the City retained Cambium Inc. (“**Cambium**”) consultants to undertake a Peer Review of the Gradient Compatibility Reports. As part of that process, Gradient updated all of their original Compatibility Reports to address Cambium’s Peer Review comments and in total, Gradient (and J.E. Coulter Associates Limited) prepared eleven (11) reports and responses that were peer reviewed by Cambium. Following a nearly two year review process, Cambium concluded that:

- the [Gradient] Studies presented to date have met the City’s requirements for Compatibility/Mitigation Studies and Air and Noise Impact Studies.

A copy of the Cambium Peer Review Letter is attached as Schedule “D” to this Letter.

Finally, City Staff support the conclusions of Bousfields, Gradient, and Cambium as evidenced by the Staff Report dated June 27, 2024 which concludes that:

- The proposal has been reviewed against the policies of the PPS (2020), A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020) and the Official Plan. Staff are of the opinion that the proposal is consistent with the PPS (2020) and conforms with the A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020). Furthermore, the



proposal conforms to the Official Plan, particularly as it relates to the massing of buildings to minimize impacts on Neighbourhoods and the Public Realm.²

In addition, the Staff report specifically states that “Staff worked with the applicant and the community to address and resolve the following key concerns: compatibility with adjacent employment uses, site organization and the provision of municipal services.”³

CONCERNS RAISED BY SANOFI PASTEUR:

We understand that despite the work undertaken to date, Sanofi remains concerned that: (i) residents at the proposed development may submit complaints related to sound generated by the Sanofi facility; and (ii) that the proposed development may result in increased security concerns related to potential overlook of the existing Sanofi facility. Tenblock has and continues to take the concerns of Sanofi very seriously.

Noise Complaints:

In regard to land use compatibility and the potential for noise complaints, the Gradient Compatibility Reports demonstrate that noise levels at the Site (resulting from stationary noise sources at the Sanofi facility) would be below the noise limits applicable in a “Class 4” area, as defined in NPC-300. The area of the proposed development and all other residential areas in proximity to the Sanofi facility are currently classified by NPC-300 as “Class 1” for noise limits. Further to the recommendations of Gradient, Cambium and City Staff, the current applications for 1875 Steeles Avenue West provide an opportunity to designate the Site as a “Class 4” area. A Class 4 area designation is made by the land use planning authority, when recommended by technical consultants, in urban areas that are candidates for intensification. A Class 4 designation allows higher noise level limits at receptors (such as residential buildings) than would otherwise be permitted in Class 1 areas. That is, with a Class 4 designation, Sanofi would be permitted to have higher noise impacts at 1875 Steeles Avenue West than currently permitted under the Class 1 classification.

The NPC-300 Class 4 area designation is now a frequently used tool to provide protection for existing industry and to ensure the ability of industry to co-exist and expand where urban intensification is proposed in the City of Toronto. NPC-300 was published in 2013 and since that time, City of Toronto Staff have made over 40 recommendations to Council to designate lands as Class 4, including in regard to 1875 Steeles. To date, it is our understanding that Council has never refused a Staff Recommendation to designate lands as Class 4. Recent examples of approved

² Director, Community Planning, North York District “1875 Steeles Avenue West – Zoning By-law Amendment and Rental Housing Demolition and Conversion Applications – Decision Report – Approval” June 27, 2024 (available online at <https://www.toronto.ca/legdocs/mmis/2024/ny/bgrd/backgroundfile-247282.pdf>) date accessed July 3, 2024 (the “Staff Report”) at page 21.

³ Staff Report at page 21.



Class 4 designations include large areas of the Central Waterfront (to provide protection for existing industry, including Redpath Sugar and Lafarge), numerous projects in Etobicoke Lakeshore, the entire Tapscott Employment Area in Scarborough (to facilitate the night shift at Surati manufacturing) and numerous individual projects across the City. A map and accompanying chart of recent Class 4 designations across the City is attached to this letter as Schedule “E”.

If the proposed development is designated as Class 4, prospective purchasers and tenants of the building will be informed that the dwelling is located in a Class 4 area that allows noise levels that are higher than in Class 1 areas. The provision of a warning clause to prospective purchasers and tenants and the registration of appropriate warning clauses on title will mitigate the potential for noise complaints at the Site related to noise sources at Sanofi’s premises. Prospective occupants will be advised of the Class 4 designation and higher noise level limits before they purchase or rent units (contrary to current tenants of the existing building at the Site). As noted above, in a Class 4 designation, noise emissions from the Sanofi facility will be evaluated on the basis of higher noise limits at 1875 Steeles Avenue West than are currently applicable, and this will provide Sanofi with a “buffer” for operation and expansion.

In addition to the higher noise level limits permitted by a Class 4 designation, which will protect Sanofi and provide a buffer for its potential expansion, the actual noise experienced by residents at a redeveloped 1875 Steeles Avenue West will be mitigated by requirements for central air conditioning, which will allow residents to keep their windows closed, and modern insulation and noise mitigation in the building envelope that will reduce interior noise levels to around 19 dBA at the location with the highest noise impact from stationary sources, when windows are closed. A19 dBA sound level is equivalent to leaves rustling. Gradient’s recommendation for a Class 4 designation and explanation of noise impacts at the Site, including from stationary noise sources (including Sanofi) and transportation noise sources, is outlined in the letter prepared by Gradient and attached as Schedule “F” to this letter.

City Staff reviewed the reports prepared by Gradient, as well as the peer reviews of such reports prepared by Cambium. The City Staff Report recommends that City Council designate 1875 Steeles West as a Class 4 noise area pursuant to NPC-300 and concludes that:

- Class 4 designation permits nearby industrial buildings to continue operating, supporting the protection of Employment Lands for current and future employment uses; and
- The [Gradient] Study concluded that the location of the proposed development is appropriate with mitigation including mandatory air conditioning and warning clauses being implemented as identified in the Study. The peer review conducted on behalf of the City agreed with this conclusion and the proposed designation of the site as Class 4 under NPC-300.



Security:

In response to the security and overlook concerns and despite the fact that security is not a land use planning matter, Tenblock engaged Juno Risk Solutions (“**Juno**”). Juno is a trusted security consultant to governments and businesses, including banks and major industries, and its expert consultants have prior experience in military intelligence, counter-intelligence, law enforcement, and facilities security. Juno conducted an extensive study of the proposed development site, taking into consideration the location of the Sanofi facility and other buildings in the area and prepared a Security Risk Evaluation Study. The Study concluded that:

- the Sanofi facility already experienced significant overwatch conditions and, specifically, existing high-rise buildings provided better vantage points to observe the Sanofi facility than the proposed development would allow;
- overwatch is easily mitigated by low-technology solutions, such as blinds, window films, and the use of internal spaces for secure discussions; and
- the more significant security concerns for bio-tech facilities are cyber and human espionage.

Juno noted that some of the most sensitive entities in the Canadian government maintain secure facilities in residential areas of much greater density and with much greater risk of overwatch than the proposed development presented to Sanofi. Juno’s concluded that “the Proposed Development has no bearing on Sanofi’s national security concerns”. A copy of Juno’s Summary Letter is included with this letter as Schedule “G”.

Water Service:

Sanofi has also noted that it is investing in upgrades to water services to its existing facility and its planned expanded operations. Sanofi wishes to ensure that it has access to sufficient and reliable water services and that it has unrestricted access to the upgraded infrastructure that it pays to have installed.

Tenblock is reviewing publicly available information in regard to Sanofi’s service infrastructure upgrades and will continue to work with Sanofi to understand the work it has undertaken to upgrade water service infrastructure, its planned work for further upgrades, and its infrastructure requirements. Further, Tenblock is investigating opportunities for mutually beneficial coordination between Tenblock and Sanofi to upgrade the watermain infrastructure on Steeles Avenue West. As outlined in the letter prepared by Lithos Group, and attached to this letter as Schedule “H” collaboration between Tenblock and Sanofi could lead to cost savings, as well as a more streamlined implementation process for the construction of the noted water service upgrades. For example, Lithos is recommending that if Sanofi property were to proceed first with the construction of watermain upgrades on Steeles to the Sanofi site, then Tenblock should share costs with Sanofi proportionate to the works required to service the 1875 Steeles Avenue West property.



In addition, and more specifically to address Sanofi's noted concerns, Tenblock can make the following commitments to Sanofi, which we propose to discuss with them in the coming weeks:

- Tenblock will not rely in any way on the incremental water capacity built for and funded by Sanofi; and
- any incremental water capacity triggered by the 1875 Steeles West development (that cannot be covered by the City's latent capacity, net of Sanofi's investment) will be Tenblock's responsibility to design, approve, and fund or install via a Municipal Infrastructure Agreement with the City.

Finally, the proposed 1875 Steeles Avenue West draft zoning by-law includes a number of holding symbol conditions related to the provision of necessary infrastructure, including potential upgrades to the 300mm water main on Steeles Avenue West. We are currently working with City Staff to ensure that the wording of the proposed holding symbol conditions included in the draft zoning by-law attached to the Staff Report properly protects Sanofi and the infrastructure constructed to service the Sanofi facility.

SUMMARY:

We continue to work with Sanofi to address their outstanding security-related, noise-related and infrastructure-related concerns. Our expert team is actively engaged with City Staff and our neighbours, including First Capital REIT, the University of Toronto and Sanofi, and we are in the process of scheduling additional meetings to discuss the above-noted concerns. Our goal is to ensure that Sanofi's concerns are addressed and that Sanofi can co-exist, operate and expand along with the proposed development at 1875 Steeles Avenue West. We are confident that we will be able to address the outstanding concerns so that much needed housing can be delivered, not only on the Site but on all of the lands designated *Mixed Use Areas*, in accordance with all applicable Provincial and Municipal land use compatibility policies and guidelines.

As noted above and further to this goal, we request that the 1875 Steeles West applications (Item No.15.4) be referred back to the Director, Community Planning, North York District, for further consideration in accordance with the motion proposed by Councillor Carroll at North York Community Council.

Yours truly,

Goodmans LLP

A handwritten signature in blue ink, appearing to read "A2" followed by a long horizontal stroke.

Anne Benedetti
AKB



cc. Nathan Muscat, City of Toronto
Chris Barnett, Osler, Hoskin & Harcourt LLP, counsel to Sanofi
Eileen Costello, Aird & Berlis LLP, counsel to First Capital REIT
Signe Leisk, Cassels Brock & Blackwell LLP, counsel to the University of Toronto
Danielle Binder, Senior Director, Policy & Advocacy, Building Industry and Land
Development Association (BILD)

1390-3650-4077

SCHEDULE “A”
LETTER FROM MINISTER TO PETER SMITH OF BOUSFIELDS

**Ministry of
Municipal Affairs
and Housing**

Office of the Minister

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Tel.: 416 585-7000

**Ministère des
Affaires municipales
et du Logement**

Bureau du ministre

777, rue Bay, 17^e étage
Toronto ON M5G 2E5
Tél. : 416 585-7000



19-3979

Peter F. Smith, MCIP, RPP
Bousfields Inc.
cheron@bousfields.ca

Dear Peter F. Smith:

Thank you for your correspondence regarding a request for reconsideration for the property municipally known as 1875 Steeles Avenue West, in the City of Toronto. Your request will be considered as part of our review of all municipal and private sector submissions that is currently ongoing. The ministry may also engage with relevant municipalities to better understand local context and municipal positions relating to these requests.

A Place to Grow: The Growth Plan for the Greater Golden Horseshoe supports the government's commitment to growth and prosperity. The Provincially Significant Employment Zone (PSEZ) framework helps to protect lands that are crucial to the strength of the region's economy. Over the longer-term, PSEZs will help to attract new investments across the region and become a tool for driving job creation.

It should be noted that policies regarding PSEZs only apply to areas within a zone that are designated as employment areas in the current municipal official plan. Land uses that are currently permitted within a zone will not change because of these policies. For example, a mixed-use designation that currently exists within an in-effect official plan continues to apply even if the lands are within a PSEZ.

Additional details regarding PSEZs, including the request for reconsideration process, can be found online at www.ontario.ca/page/provincially-significant-employment-zones.

Once again, thank you for bringing your request to my attention. Please accept my best wishes.

Sincerely,

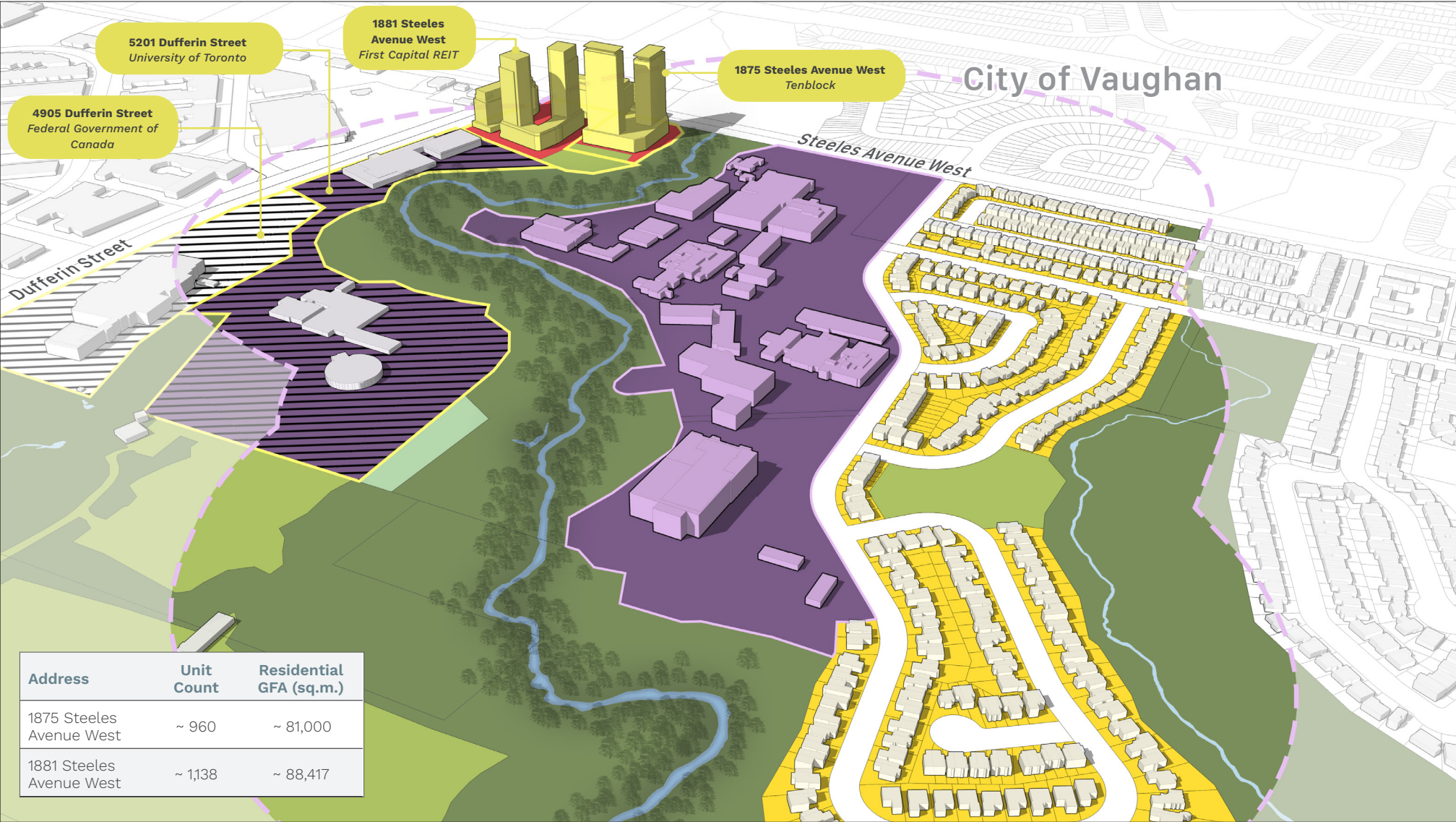
Steve Clark
Minister

c. Michael Naiberg,
Microbjo Properties Inc.

SCHEDULE “B”
BOUSFIELDS BLOCK CONTEXT PLAN DATED JULY 2024

Block Context Plan 1875 Steeles Avenue West Toronto ON

Development Activity (View Looking Northwest)



Legend

Neighbourhoods Land Use

Mixed Use Areas Land Use

Natural Areas Land Use

Parks Land Use

Other Open Spaces Land Use

Core Employment Land Use

Special District

Active Development Proposals Residential Uses

SCHEDULE “C”
BOUSFIELDS’ LETTER DATED DECEMBER 7, 2023

December 7, 2023

City of Toronto, City Planning Division
Community Planning – North York District
North York Civic Centre
5100 Yonge Street
Toronto, ON M3N 5B7

Attn: Stephen Gardiner, MCIP, RPP

Dear Mr. Gardiner,

**Re: *Planning Commentary regarding Compatibility/Mitigation Study
Zoning By-law Amendment and Draft Plan of Subdivision Applications
Files 20 213392 NNY 06 OZ and 20 213394 NNYZ 06 SB
1875 Steeles Avenue West***

We have prepared this letter to accompany submission of the Compatibility/Mitigation Study in support of the above-noted applications (*Compatibility and Mitigation Study*, Gradient Wind Engineers and Scientists, August 22, 2023), as well as the Peer Review Response Letter, dated December 4, 2023. The purpose of this letter is to indicate how the Gradient Compatibility/Mitigation Study has addressed the applicable policies and guidelines at both a Provincial and Municipal level.

Provincial Policies

In our opinion, the Compatibility/Mitigation Study demonstrates consistency/conformity with the applicable policies in the Provincial Policy Statement and the Growth Plan for the Greater Golden Horseshoe.

In this regard, Policy 1.2.6.1 of the PPS provides that major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.

Policy 1.2.6.2 goes on to provide that, where avoidance is not possible in accordance with Policy 1.2.6.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other uses that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses are only permitted if the following are demonstrated in accordance with provincial guidelines, standards and procedures:

- there is an identified need for the proposed use;
- alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;
- adverse effects to the proposed sensitive land uses are minimized and mitigated; and
- potential impacts to industrial, manufacturing or other uses are minimized and mitigated.

With respect to the Growth Plan, Policy 2.2.5(7) requires municipalities to plan for all employment areas within settlement areas by, among other things, providing an appropriate interface between employment areas and adjacent non-employment areas to maintain land use compatibility. Policy 2.2.5(8) provides that development of sensitive uses will, in accordance with provincial guidelines, avoid, or where this is not achievable, minimize and mitigate adverse impacts on industrial, manufacturing or other uses that are particularly vulnerable to encroachment.

Based on the Gradient Wind Compatibility/Mitigation Study, it is our opinion that the proposed development is consistent with the applicable PPS policies and conforms with applicable Growth Plan policies as set out above. In this regard, the following considerations are noted:

1. The subject site is already occupied by a sensitive use i.e. a 4-storey apartment building, built in approximately 1973. The apartment use on the site has co-existed with the Sanofi Pasteur use since that time.
2. The subject site is designated *Mixed Use Areas* and is zoned RM (f21.0; a835; d1.0), with a maximum lot coverage of 35%. The RM zoning permits a wide range of residential dwelling types, including low-rise apartment buildings. The Official Plan permits the redevelopment of the subject site with tall residential buildings, although a rezoning is required to increase the permitted height and density.
3. The subject site is physically separated and buffered from the Sanofi Pasteur complex to the east by the West Don River valleylands system, resulting in a separation distance of approximately 105 metres.
4. As noted in the Compatibility/Mitigation Study, the area surrounding the Sanofi Pasteur complex already includes sensitive uses, such as the apartment buildings in the northeast quadrant of the intersection of Steeles Avenue and Dufferin Street, and low-rise residential neighbourhoods to the north and east of Sanofi Pasteur. Furthermore, several development applications in the area are proposing sensitive land uses, such as high-rise residential proposed at the adjacent property, at 1881 Steeles Avenue West.

5. There is a need for the proposed residential use, which as noted above is already permitted by the Official Plan and Zoning By-law. In order to achieve Toronto's housing pledge of 285,000 new residential units by 2031, there is a need to support residential intensification on sites which are already designated and zoned for apartment residential use, such as the subject site.
6. There is no need to evaluate alternative locations for the proposed use, since the proposed use is already permitted on the subject site.
7. In reliance on the Compatibility/Mitigation Study, we conclude that there will be no "adverse effects" on either the proposed sensitive use or the Sanofi Pasteur pharmaceutical use. In this regard, Gradient Wind has determined that, based on an analysis of noise, vibration and air quality impacts, the proposed intensification of the subject site will not create land use incompatibilities.
8. Mitigation measures are recommended by Gradient Wind as set out in Section 4.4 (air quality) and Section 5.5.1 (noise) of its report. Among other matters, it recommends that a Class 4 designation for the proposed sensitive land use should be considered as part of the approval process, as per NPC-300 guidelines.
9. Based on the foregoing, an appropriate interface will be provided between the Sanofi Pasteur employment use and adjacent non-employment areas, including the subject site, to maintain land use compatibility.

Official Plan Policies

In our opinion, the Compatibility/Mitigation Study demonstrates conformity with the applicable policies in the Official Plan.

Policy 2.2.4(5) states that sensitive land uses, including residential uses, where permitted or proposed adjacent to or near to *Employment Areas*, should be planned to ensure they are appropriately designed, buffered and/or separated as appropriate from *Employment Areas* and/or major facilities as necessary in order to:

- prevent or mitigate adverse effects from noise, vibration and emissions, including dust and odour;
- minimize risk to public health and safety;
- prevent or mitigate negative impacts and minimize the risk of complaints;
- ensure compliance with environmental approvals, registrations, legislation, regulations and guidelines at the time of the approval being sought for the sensitive land uses, including residential uses; and
- permit *Employment Areas* to be developed for their intended purpose.

Policy 2.2.4(6) provides that an application to develop or intensify sensitive land uses, including residential uses, adjacent or near to *Employment Area* shall include a Compatibility/Mitigation Study, which will be addressed in the applicant's Planning Rationale. Policy 2.2.4(7) states that, among other things, the Compatibility/Mitigation Study will identify and evaluate options to achieve appropriate design, buffering and/or separation distances between the proposed sensitive land uses and nearby *Employment Areas*.

Policy 3.4(21) of the Plan provides that industries and sensitive land uses, such as residences, will be appropriately designed, buffered and/or separated from each other to prevent adverse effects from noise, vibration, odour and other contaminants, and safety will be promoted through the identification of impacts and the implementation of appropriate mitigative measures.

A Compatibility/Mitigation Study is described in Schedule 3 of the Official Plan as "a technical report that provides a written description of the land use compatibility of sensitive land uses, including residential uses, where permitted or proposed outside of and adjacent to or near to Employment Areas or within the influence area of major facilities".

As described above, the Compatibility/Mitigation Study recommends mitigation measures in Section 4.4 (air quality) and Section 5.5.1 (noise) which will achieve appropriate design, buffering and/or separation distances between the proposed sensitive land use and the Sanofi Pasteur use and will prevent adverse effects.

Toronto Development Guide Terms of Reference

Following from the description of a Compatibility/Mitigation Study in Schedule 3 of the Official Plan as set out above, the Terms of Reference state that the report will identify any existing and potential land use compatibility issues and will identify and evaluate options to achieve appropriate design, buffering and/or separation distances between the proposed sensitive land uses, including residential uses, and nearby *Employment Areas* and/or major facilities. Recommended measures intended to eliminate or mitigate negative impacts and adverse effects are to be addressed in the applicant's Planning Rationale where one is required.

The Terms of Reference indicate that the report will be used to assist City Council in making its decision concerning the proposed sensitive land uses, including residential uses. The Land Use Compatibility/Mitigation Study is to be prepared on behalf of the applicant by a Consultant (or Consultants) that is/are fully accredited, qualified and/or certified in the relevant matters being evaluated and recommended (for example air quality assessments should be performed by an engineer fully accredited in such field, etc.).

In our opinion, the Gradient Wind Compatibility/Mitigation Study responds appropriately to the foregoing Terms of Reference.

In addition, the supporting noise studies have had regard for the City's Terms of Reference for Noise Impact Studies. The Terms of Reference describe a Noise Impact Study as a technical report that provides a written description of the impact of noise generated by a proposed development on the surrounding environment, the impact of noise from the surrounding environment on the proposed development and the impact of noise from the proposed development on itself as well as mitigation measures to reduce any negative impacts. This Noise Impact Study is to be prepared, on behalf of the applicant, by a Consultant that is either an accredited Acoustic expert or a qualified Professional Engineer.

We trust the foregoing is sufficient for your purposes; however, if you have any questions or require further clarification, please do not hesitate to contact me.

Yours truly,

Bousfields Inc.



Peter F. Smith, MCIP, RPP

cc. Tenblock

SCHEDULE “D”
CAMBIUM PEER REVIEW LETTER DATED JANUARY 5, 2024



Environmental

Geotechnical

Building Sciences

Construction Quality
Verification

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(705) 742.7900

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(705) 742.7907

Website

cambium-inc.com

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Locations

Peterborough
Kingston
Barrie
Oshawa

Laboratory

Peterborough



January 5, 2024

City of Toronto
City Hall, 100 Queen Street West, Floor 18
Toronto, ON M5H 2N2

Attn: Stephen Gardiner
Senior Planner, North York

Stephen.Gardiner@toronto.ca

Re: Final Response to Peer Review Response Letter
1875 Steeles Avenue West, Toronto, Ontario
Cambium Reference: 12639-060

Dear Mr. Gardiner,

As per the City of Toronto's (the City's) request, Cambium Inc. (Cambium) has completed a final review of the provided letter from Gradient Wind Engineering Inc. dated December 4, 2023, related to the Peer Review Responses to date for the following application made by Tenblock:

- A zoning bylaw amendment (ZBA) to permit a mixed-use development and parkland uses at 1875 Steeles Avenue West in Toronto, Ontario (the Site).

The associated reports have been reviewed to date are as follows.

1. *Gradient Wind Engineering Inc. – Compatibility and Mitigation Study* dated September 19, 2022 (the Compatibility Study).
2. *Gradient Wind Engineering Inc. – Detailed Air Quality Study* dated September 19, 2022 (the Air Quality Study).
3. *J. E. Coulter Associates Limited – Noise & Vibration Impact Feasibility Study* dated October 9, 2020 (the Noise & Vibration Study).
4. *Gradient Wind Engineering Inc. – Traffic Noise & Vibration Addendum* dated November 19, 2021 (the Traffic Study).
5. *Gradient Wind Engineering Inc. – Stationary Noise Assessment* dated March 19, 2022 (the Stationary Noise Study).



Environmental

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Construction Quality
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Canada, K9J 6Z3

Locations

Peterborough
Kingston
Barrie
Oshawa

Laboratory

Peterborough



January 5, 2024

Reports were updated based on Cambium's comments and the following documents were additionally reviewed:

1. *Gradient Wind Engineering Inc. – Peer Review Response Letter* dated August 22, 2023 (the Response Letter).
2. *Gradient Wind Engineering Inc. – Compatibility and Mitigation Study* dated August 22, 2023 (the Updated Compatibility Study).
3. *Gradient Wind Engineering Inc. – Detailed Air Quality Study* dated August 22, 2023 (the Updated AQ Study).
4. *Gradient Wind Engineering Inc. – Traffic Noise & Vibration Addendum* dated August 22, 2023 (the Traffic Study).
5. *Gradient Wind Engineering Inc. – Stationary Noise Assessment* dated August 22, 2023 (the Updated Stationary NA).
6. ***Gradient Wind Engineering Inc. – Peer Review Response Letter, 1875 Steels Avenue West, North York, GW File No.: 20-105 Response Letter dated December 4th, 2023.***

This review is limited to evaluating the completeness of the Study's methodology, findings, recommendations, and use of applicable standards and guidelines.

Duplication of calculations was also excluded from this scope of work.

It should be noted that Cambium's comments are provided for City consideration only and should not be considered modifications to the original reports.

Our letter response related to this file dated November 23rd, 2023 has suggested that the air pollution modelling should be updated to match the MECP's approved methodology and utilize the latest approved version of AERMOD and the associated MET data (i.e. version 22112) to assess for air emissions impacts.

Gradient Wind has noted that this has been completed and that only a minor variation was noted to occur when compared to the previous results attained and conditions were slightly improved with this altered assessment. Therefore, Cambium notes that this final item that required clarification is considered complete and deemed appropriate.



Environmental

Geotechnical

Building Sciences

Construction Quality
Verification

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January 5, 2024

CLOSING

In Cambium's opinion, the Studies presented to date have met the City's requirements for Compatibility/Mitigation Studies and Air and Noise Impact Studies.

We trust this peer review of the Study for 1875 Steeles Avenue West in Toronto, Ontario, meets your current requirements. Should you have any questions or require additional information, please do not hesitate to contact the undersigned.

Best regards,

Cambium Inc.



Sadie Bachynski, P.Eng.
Senior Project Manager

Trevor Copeland, P.Eng.
Senior Project Manager

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January 5, 2024

STANDARD LIMITATIONS

Limited Warranty

In performing work on behalf of a client, Cambium relies on its client to provide instructions on the scope of its retainer and, on that basis, Cambium determines the precise nature of the work to be performed. Cambium undertakes all work in accordance with applicable accepted industry practices and standards. Unless required under local laws, other than as expressly stated herein, no other warranties or conditions, either expressed or implied, are made regarding the services, work or reports provided.

Reliance on Materials and Information

The findings and results presented in reports prepared by Cambium are based on the materials and information provided by the client to Cambium and on the facts, conditions and circumstances encountered by Cambium during the performance of the work requested by the client. In formulating its findings and results into a report, Cambium assumes that the information and materials provided by the client or obtained by Cambium from the client or otherwise are factual, accurate and represent a true depiction of the circumstances that exist. Cambium relies on its client to inform Cambium if there are changes to any such information and materials. Cambium does not review, analyze or attempt to verify the accuracy or completeness of the information or materials provided, or circumstances encountered, other than in accordance with applicable accepted industry practice. Cambium will not be responsible for matters arising from incomplete, incorrect or misleading information or from facts or circumstances that are not fully disclosed to or that are concealed from Cambium during the provision of services, work or reports.

Facts, conditions, information and circumstances may vary with time and locations and Cambium's work is based on a review of such matters as they existed at the particular time and location indicated in its reports. No assurance is made by Cambium that the facts, conditions, information, circumstances or any underlying assumptions made by Cambium in connection with the work performed will not change after the work is completed and a report is submitted. If any such changes occur or additional information is obtained, Cambium should be advised and requested to consider if the changes or additional information affect its findings or results.

When preparing reports, Cambium considers applicable legislation, regulations, governmental guidelines and policies to the extent they are within its knowledge, but Cambium is not qualified to advise with respect to legal matters. The presentation of information regarding applicable legislation, regulations, governmental guidelines and policies is for information only and is not intended to and should not be interpreted as constituting a legal opinion concerning the work completed or conditions outlined in a report. All legal matters should be reviewed and considered by an appropriately qualified legal practitioner.

Site Assessments

A site assessment is created using data and information collected during the investigation of a site and based on conditions encountered at the time and particular locations at which fieldwork is conducted. The information, sample results and data collected represent the conditions only at the specific times at which and at those specific locations from which the information, samples and data were obtained and the information, sample results and data may vary at other locations and times. To the extent that Cambium's work or report considers any locations or times other than those from which information, sample results and data was specifically received, the work or report is based on a reasonable extrapolation from such information, sample results and data but the actual conditions encountered may vary from those extrapolations.

Only conditions at the site and locations chosen for study by the client are evaluated; no adjacent or other properties are evaluated unless specifically requested by the client. Any physical or other aspects of the site chosen for study by the client, or any other matter not specifically addressed in a report prepared by Cambium, are beyond the scope of the work performed by Cambium and such matters have not been investigated or addressed.

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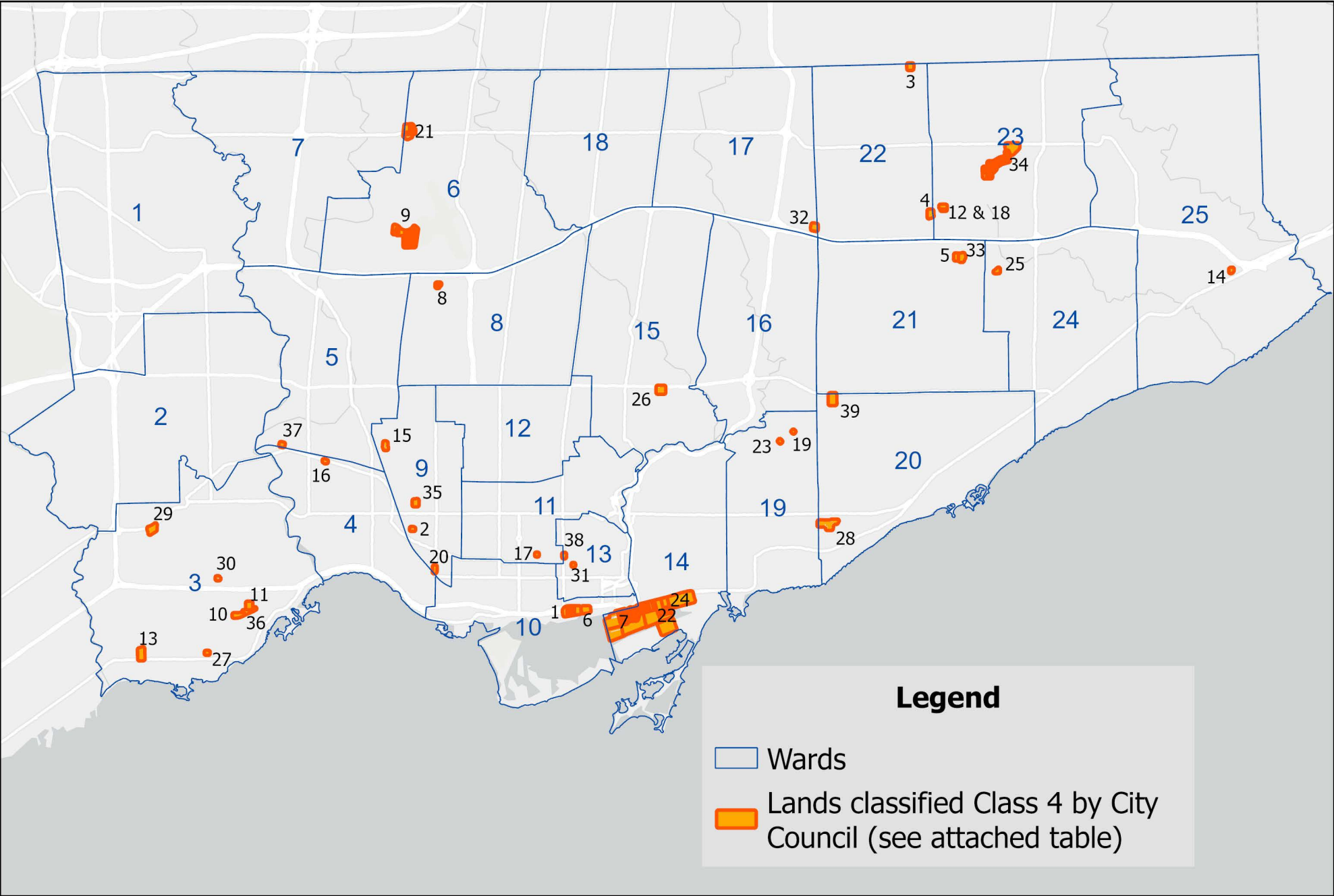
Potential liability to the client arising out of the report is limited to the amount of Cambium's professional liability insurance coverage. Cambium shall only be liable for direct damages to the extent caused by Cambium's negligence and/or breach of contract. Cambium shall not be liable for consequential damages.

Personal Liability

The client expressly agrees that Cambium employees shall have no personal liability to the client with respect to a claim, whether in contract, tort and/or other cause of action in law. Furthermore, the client agrees that it will bring no proceedings nor take any action in any court of law against Cambium employees in their personal capacity.

SCHEDULE “E”
MAP AND CHART RE CLASS 4 DESIGNATIONS DATED JULY 16, 2024

Toronto City Council Class 4 property classifications since 2016



Map #	Lands	Description of Lands / Proposal	Estimated Dwelling Units	Committee	Did Staff Recommend Class 4	Did City Council Classify Class 4	Date of Council Approval	Council Item and Link
39	Class 4 classifications since 2016		61,810	Estimated dwelling units				
39	1891 Eglinton Ave. E.	4 towers (48, 44, 44, & 12 storeys)	1,700	SCC	Yes	Yes	May 22, 2024	2024.SC13.2
38	363-391 Yonge St.	1 tower (85 storeys)	1,415	TEYCC	Yes	Yes	March 20, 2024	2024.TE11.9
37	175-185 Eileen Ave.	Townhouse blocks (3 storeys)	58	EYCC	Yes	Yes	October 11, 2023	2023.EY7.1
36	315-327 Royal York Rd. & 27-39 Newcastle St.	6 towers (22, 30, 34, 35, & 36 storeys)	2,078	EYCC	Yes	Yes	July 19, 2023	2023.EY6.23
35	640 Lansdowne Ave.	Long term care centre (7 storeys)	57	Direct to City Council	Yes	Yes	July 19, 2023	2023.CC8.7
34	Tapscott Employment Area (31 Tapscott Rd.)	Various developable lands (to facilitate night shift at Surati manufacturing plant)	-	Direct to City Council	Yes	Yes	March 29, 2023	2023.MM5.47
33	25 Borough Dr.	3 towers (35, 41, & 45 storeys)	1,285	SCC	Yes	Yes	July 19, 2022	2022.SC33.3
32	2450 Victoria Park Ave.	4 towers (11, 20, 24, & 44 storeys)	1,029	NYCC	Yes	Yes	July 19, 2022	2022.NY33.13
31	241 Church St.	1 tower (53 storeys)	592	TEYCC	Yes	Yes	July 19, 2022	2022.TE34.26
30	933-935 The Queensway	1 midrise (11 storeys)	191	EYCC	Yes	Yes	May 11, 2022	2022.EY31.6
29	5415-5481, 5485 and 5487 Dundas St. W & 15 and 25 Shorncliffe Rd.	12 towers (26 to 44 storeys)	2,975	EYCC	Yes	Yes	February 2, 2022	2022.MM39.33
28	411 Victoria Park Ave., 2510 and 2530 Gerrard St. E.	4 midrise buildings (8, 9, 9, & 12 storeys) and 2 townhouse blocks	1,052	SCC	Yes	Yes	July 14, 2021	2021.SC25.1
27	150 Eighth St.	1 building (6 storeys)	58	EYCC	Yes	Yes	July 14, 2021	2021.EY25.8
27	815 to 845 Eglinton Ave. E.	8 buildings (1, 5, 10, 12, 18, 21, 29, & 34 storeys) and a childcare facility	1,673	NYCC	Yes	Yes	May 5, 2021	2021.NY23.5
26	1744 to 1750 Ellesmere Rd.	1 midrise (15 storeys)	242	SCC	Yes	Yes	May 5, 2021	2021.SC23.2
24	Port Lands - Warehouse District	Various light industrial and production non-residential uses	-	Direct to City Council	Yes	Yes	March 10, 2021	2021.CC30.12
23	968 O'Connor Dr.	1 midrise (10 storeys)	126	TEYCC	Yes	Yes	March 10, 2021	2021.TE23.16
22	Port Lands - Media City, Turning Basin, and Hearn Districts	Various production, interactive, and creative non-residential uses	-	Direct to City Council	Yes	Yes	December 16, 2020	2020.CC27.5
21	Mixed Use Areas within Keele Finch Secondary Plan Area	Various lands and proposals	~11,500	PHC	Yes	Yes	December 16, 2020	2020.PH19.1
20	390 to 440 Dufferin St.	3 midrises (13, 10, & 9 storeys)	397	TEYCC	Yes	Yes	December 16, 2020	2020.TE21.33
19	1165 O'Connor Dr.	1 stacked townhouse block (4 storeys)	20	TEYCC	Yes	Yes	May 28, 2020	2020.TE14.34

Lands Classified Class 4 (NPC-300) by Toronto City Council since 2016, as Recommended by Toronto City Staff
Current to July 16, 2024

Map #	Lands	Description of Lands / Proposal	Estimated Dwelling Units	Committee	Did Staff Recommend Class 4	Did City Council Classify Class 4	Date of Council Approval	Council Item and Link
18	23 Glen Watford Dr.	2 towers (28 storeys)	551	SCC	Yes	Yes	April 26, 2020	2020.SC13.2
17	193-195 McCaul St.	1 tower (19 storeys)	266	Direct to City Council	Yes	Yes	July 16, 2019	2019.CC9.23
16	3385 Dundas St. W.	1 midrise (7 storeys)	131	TEYCC	Yes	Yes	July 16, 2019	2019.TE7.5
15	1800-1818 St. Clair Ave. W. & 383, 423, and 425 Old Weston Rd.	1 midrise (11 storeys) and 5 townhouse blocks (3 storeys)	276	TEYCC	Yes	Yes	March 27, 2019	2019.TE4.12
14	6480-6484 Kingston Rd.	3 townhouse blocks (3 storeys)	12	SCC	Yes	Yes	March 27, 2019	2019.SC4.10
13	3526 Lake Shore Blvd. W.	Townhouses	415	Direct to City Council	Yes	Yes	December 4, 2018	2019.CC1.22
12	25 Glen Watford Dr.	Retirement home (10 storeys)	249	SCC	Yes	Yes	July 23, 2018	2018.SC32.18
11	Block A1, Mimico-Judson Secondary Plan (21-25, 31 Windsor St., 60 Newcastle St.)	Various lands and proposals	1,098	City Council	Yes	Yes	May 22, 2018	2018.CC41.6
10	Block F, Mimico-Judson Secondary Plan (49, 53, and 55 Judson St.)	Various lands and proposals	72	City Council	Yes	Yes	March 26, 2018	2018.CC38.11
9	80 Carl Hall Rd.	Detached, semi-detached, townhouse, and stacked townhouse blocks	580	NYCC	Yes	Yes	January 31, 2018	2018.NY27.6
8	36 and 37 Jane Osler Blvd. and 42 and 44 Cartwright Ave.	Detached houses	8	NYCC	Yes	Yes	January 31, 2018	2018.NY27.1
7	Port Lands - Villiers Island, Polson Quay, South River, McCleary Districts	Various lands and proposals including 4 child care facilities	19,400	PGM	Yes	Yes	December 5, 2017	2017.PG24.6
6	Port Lands - FedEx District	Various lands and proposals	1,754	Direct to City Council	Yes	Yes	November 7, 2017	2017.MM34.40
5	1680 Brimley Rd.	4 towers (36, 39, 41, & 47 storeys) and a child care facility	1,591	Direct to City Council	Yes	Yes	October 2, 2017	2017.MM32.34
4	4181 Sheppard Ave. E.	Townhouse and mixed-use blocks	80	SCC	Yes	Yes	July 4, 2017	2017.SC23.12
3	4665 Steeles Ave. E.	3 towers (9, 17, & 27 storeys)	793	PGM	Yes	Yes	April 26, 2017	2017.PG19.4
2	138 St. Helen's Ave.	1 midrise (9 storeys)	86	TEYCC	Yes	Yes	March 9, 2017	2017.TE22.4
1	Port Lands - Lower Yonge District	Various lands and proposals	8,000	TEYCC	Yes	Yes	June 7, 2016	2016.TE16.4
39	Class 4 classifications since 2016		61,810	Estimated dwelling units				

SCHEDULE “F”
GRADIENT LETTER DATED JULY 17, 2024

GRADIENTWIND

ENGINEERS & SCIENTISTS

July 17, 2024

Tenblock

30 Soudan Avenue, Suite 200
Toronto, ON
M4S 1V6

Re: Summary of Air and Noise Reports
1875 Steeles Avenue West, North York
GW File No.: 20-105-Cover Letter

Gradient Wind Engineering Inc. (Gradient Wind) was retained by Tenblock to undertake noise, land use compatibility and air quality assessments and studies for the proposed development located at 1875 Steeles Avenue West (Site).

The studies and assessments Gradient Wind completed included a consideration of the following impacts at the proposed development:

- Air quality and odour impacts from surrounding industrial properties;
- Stationary noise impacts from surrounding industrial and commercial properties, including the Sanofi Pasteur facility;
- Transportation noise and vibration impacts.

Air Quality

Based on our studies, air quality conditions at the development comply with the applicable regulatory criteria, specifically the Air Contaminant Benchmark Standards and Ambient Air Quality Criteria published by the Ministry of the Environment, Conservation and Parks (MECP).

Environmental Noise (Stationary and Transportation Noise) and Vibration

The proposed development is a high-rise residential building. Taking into account the noise control measures to be implemented at the building, Gradient Wind concluded that the proposed development is compatible with surrounding land-uses. Specifically, based on an analysis of noise, vibration and air quality impacts, the development of the subject lands for high-rise residential uses will not create land use incompatibilities.

Gradient Wind recommended that the City designate the site of the proposed development as a “Class 4” area for the purposes of establishing acceptable noise levels, as per the MECP’s Publication NPC-300 (Environmental Noise Guideline – Stationary and Transportation Sources – Approval and Planning). The City’s peer reviewer supported Gradient Wind’s recommendation for Class 4 and the designation was also recommended by City Staff.

NPC-300 allows for an area with a proposed new noise sensitive land use located adjacent to existing and lawfully established stationary sources to be designated as a Class 4 area. A Class 4 noise area designation allows for higher daytime and night-time noise level limits than would otherwise be permitted at a residential building, provided that certain conditions are met, such as providing the building with central air conditioning. The current noise area designation at the Site is Class 1.

Table 1 below is excerpted from Gradient Wind’s stationary noise report and summarizes the impacts of noise from the Sanofi Pasteur facility on the proposed development. The noise impacts are based on all noise sources at Sanofi Pasteur operating at the same time, 100 % of the time. Even with such conservative assumptions, the noise impacts at nighttime (as indicated in bold text in the table below) only minorly exceed the Class 1 sound level limits and are well within the Class 4 sound level limits.

TABLE 1: NOISE LEVELS FROM SANOFI PASTURE ONTO THE PROPOSED DEVELOPMENT

Receptor Number	Height Above Grade (m)	Noise Level (dBA)		Sound Level Limits (Class 1)		Sound Level Limits (Class 4)		Meets Criteria (Class 4)	
		Day	Night	Day	Night	Day	Night	Day	Night
R1_A	40	47	47	50	45	60	55	Yes	Yes
R1_B	60	48	48	50	45	60	55	Yes	Yes
R1_C	80	48	48	50	45	60	55	Yes	Yes
R2_A	40	47	47	50	45	60	55	Yes	Yes
R2_B	60	48	48	50	45	60	55	Yes	Yes
R2_C	80	48	48	50	45	60	55	Yes	Yes
R3_A	40	48	48	50	45	60	55	Yes	Yes
R3_B	60	48	48	50	45	60	55	Yes	Yes
R3_C	80	48	48	50	45	60	55	Yes	Yes
R3_D	100	48	48	50	45	60	55	Yes	Yes
R4_A	40	48	48	50	45	60	55	Yes	Yes
R4_B	60	48	48	50	45	60	55	Yes	Yes
R4_C	80	48	48	50	45	60	55	Yes	Yes
R4_D	100	48	48	50	45	60	55	Yes	Yes
R5_A	7.5	45	45	50	45	60	55	Yes	Yes
R6_A	7.5	45	45	50	45	60	55	Yes	Yes
R7_A	1.5	47	47	50	45	60	N/A	Yes	Yes

Note: Bold text indicates where noise levels exceed Class 1 sound level limits.

The primary sources of transportation noise impacting the proposed development are Steeles Avenue West, Dufferin Street, and minor impacts from the CN Rail corridor approximately 435 m north of the site. The dominant source of transportation noise for this site is due to roadway traffic sources, and the noise levels generated by transportation noise are higher than the stationary noise levels originating from the Sanofi Pasteur facility. In fact, at many points of reception on the proposed building, noise impacts from traffic will be in the range of 5 to 20 dBA higher than noise impacts from stationary sources originating at the Sanofi Pasteur facility.

We note that the noise levels, as set out in Table 1 above, are predicted at the outside point of a window. The proposed new building will be constructed with STC-36 rated windows, which will provide approximately 36 dBA noise attenuation compared to the outside point of the window, meaning that for a residential unit experiencing 48 dBA at the outside point of a window, the indoor noise level (with the window closed) would be around 19 dBA. The perception of loudness at 19 dBA is equivalent to leaves rustling. We also note that the proposed building would have central air conditioning, which would allow residents to keep their windows closed for larger portions of the year. The current building at the Site does not have central air conditioning and, with windows open, residences would experience indoor sound level of around 35 dBA.

If you have any questions or wish to discuss our findings, please advise us. In the interim, we thank you for the opportunity to be of service.

Sincerely,

Gradient Wind Engineering Inc.



Joshua Foster, P.Eng.
Lead Engineer

Gradient Wind File #20-105-CoverLetter – July 15, 2024

**SCHEDULE “G”
SUMMARY LETTER PREPARED BY JUNO RISK SOLUTIONS
DATED JULY 11, 2024**

Juno Risk Solutions
1 Rideau Street
Suite 700
Ottawa, ON K1N 8S7

July 11, 2024

Anne Benedetti
Goodmans LLP
Bay Adelaide Centre
333 Bay Street, Suite 3400
Toronto, ON M5H 2S7

Security Risk Evaluation of Tenblock Proposed Development at 1875 Steeles to Sanofi Operations at 1755 Steeles

Juno Risk was retained in early 2022 to provide an analysis of any changed risks to national security presented to the Sanofi Operations at 1775 Steeles Avenue West ("Sanofi") by the construction of the development proposed by Tenblock at 1875 Street Avenue West (the "Proposed Development"). At your request, we recently reviewed the contents of the report we prepared for you dated March 10, 2022. We can confirm that the analytical judgements and information contained within the report upon which those judgements rely remain consistent with our current assessment of the security risk presented by the proposed development at 1875 Steeles Avenue West.

As a Canadian-based security company, we share Sanofi's national security concerns and direct our work toward improving the security posture of organizations across the ten critical infrastructure sectors in Canada. In this case, our finding is that the Proposed Development has no bearing on Sanofi's national security concerns.

We have evaluated Sanofi's national security concerns, and have determined that while national security is a valid general concern for a facility such as Sanofi, it is clear that the national security risk presented by overwatch specifically is minimal. The risk that is presented by overwatch already exists – the greatest sources of overwatch risk arise from buildings in the vicinity, and have no relation to Tenblock's property or the Proposed Development. Any risk that is presented by overwatch concerns from other properties can be easily mitigated by blinds, drapes, or window films, as may already be in use.

Indeed, some of the most sensitive entities in the Canadian government maintain secure facilities that present much higher priority national security targets for foreign intelligence collection in residential areas of much greater density and with much greater potential for overwatch risk than that presented in the Proposed Development. For example, it is public knowledge that within the Ottawa urban core, the Ministerial offices and principal supporting department staff of Public Safety Canada, the Prime Minister's Office, the Privy Council Office, Industry Science and Economic Development to name a few are all located either adjacent to or within the immediate environs of high-rise condominium buildings. Juno Risk has conducted threat risk assessments of many of these facilities and each have been able to address overwatch concerns with standard security measures as discussed within our report and which Sanofi appears to have already in place.

To summarize, Sanofi's national security concerns around overwatch risk are valid (though minimal), and are easily remedied, but exist irrespective of the Proposed Development. Furthermore, we have evaluated additional national security concerns more generally and how they would more likely manifest at Sanofi. It is our professional opinion that these more general concerns equally have no bearing on the Proposed Development. Beyond overwatch and physical security, a facility such as Sanofi might better focus its national security concerns on cyber or human espionage; not only are these the attack vectors that CSIS recommends the Bio-Tech industry focus on, but they are also borne out in existing cases of prosecuted espionage against firms in this industry. From a threat actor's perspective, the return on their espionage investment is likely to be far greater by pursuing one of these methods. Having evaluated the wide range of national security concerns, it is our opinion that the Proposed Development will have no impact on these other concerns either.

In reaching these conclusions, Juno Risk relied upon an integrated assessment team lead by me and supported by Mr. Michael Thompson and Mr. Tim Steen. My background includes a 20-year career as an intelligence officer for the Royal Canadian Navy followed by a further 20 year career as a security risk consultant. I am a lawyer and a national security specialist by education and training. As CEO of Juno Risk Solutions, I founded and have lead for the last 15 years a boutique consulting firm that includes as a dedicated practice area focused on advising businesses on national security issues and how to mitigate risks posed by foreign intelligence collection and insider threats. Mr. Thompson is a security professional and investigator with more than 45 years of experience conducting physical security assessments. He is board certified in physical security and trains candidates for certification by the American Society for Industrial Security (ASIS). Mr. Steen was formerly the chief of security for FINTRAC and CSIS and his highly experienced at designing, implementing and assessing security programs in highly classified and sensitive environments.

We encourage Goodmans and Tenblock to share our findings broadly, as we believe refocusing efforts regarding national security concerns will equally be of benefit to Sanofi – since the Proposed Development itself has no bearing on these concerns. Please communicate any questions directly to me, or more general inquiries to info@JunoRisk.com.

Regards,

A handwritten signature in black ink, appearing to read "A. Chester".

Andrew Chester, CD, JD
President, Juno Risk Solutions Inc.
613-297-3488 (M) | 613-297-3488 (O) | andrew.chester@junorisk.com

SCHEDULE “H”
LITHOS GROUP LETTER DATED JULY 17, 2024



July 17th, 2024

Tenblock
30 Soudan Avenue, Suite 200
Toronto, ON, M4S 1V6

Attention: Stephen Job

Re: Recommendation Letter regarding required watermain upgrades on Steeles Avenue West
Location: 1875 Steeles Avenue West
City of Toronto

In July 2020, Lithos Group Inc. was retained by Tenblock as civil engineers to conduct functional servicing and stormwater management analysis and conceptual design for the development application proposing 960 new apartments at 1875 Steeles Avenue West.

The analysis revealed that installation of a second (twinning) 300mm diameter watermain parallel to the existing one on Steeles Avenue West, between Dufferin Street in the west and 1875 Steeles Avenue West in the east, will be required to support the application. Please refer to the "Key Plan" figures, found in **Appendix A**, for details.

Tenblock instructed us to develop a comprehensive design for completing this upgrade of the City's watermain infrastructure along Steeles Avenue West at Tenblock's cost, and without relying on any other landowner or development applicant. As engineers, we are prepared to design and implement the necessary upgrades to the municipal water network to service 1875 Steeles Avenue West, ensuring that the subject project will not rely on any improvements proposed to support other applications.

However, we also understand that a similar infrastructure upgrade (a twinned watermain parallel to the existing one) may at some point in the future be desirable or necessary for the neighbouring landowner Sanofi Pasteur at 1755 Steeles Avenue West. It is our opinion that there may be mutual benefits in coordinating the upgrades to the watermain infrastructure along Steeles Avenue West to serve multiple landowners. We would be happy to collaborate to the extent that Sanofi Pasteur wishes and explore opportunities for joint efforts. Such collaboration could potentially lead to significant cost savings, as well as to a more streamlined implementation process for both parties. In particular, it is our expectation that the cost and scope of Sanofi Pasteur's similar infrastructure upgrade (if desirable or necessary) would be significantly reduced by the work that Tenblock will complete between Dufferin Street and 1875 Steeles Avenue West.

If helpful for discussions between the landowners, we have prepared approximate cost estimates for various scenarios and would be happy to circulate and discuss these as needed.

If the property at 1755 Steeles Avenue West were to proceed first with construction of the watermain upgrades from Dufferin Street up to their site, it is our recommendation that Tenblock contribute costs to Sanofi Pasteur, proportionate to the works required to service the property at 1875 Steeles Avenue West (PART A in "Key Plan" figures, found in **Appendix A**). We would be happy to coordinate with their civil engineers to ensure that Tenblock fairly contributes to the upgrades, per Tenblock's consistent instructions to us as engineers.

We are available to join you in any discussions regarding this topic. Should you have any further questions, please feel free to contact the undersigned.

Yours truly,

LITHOS GROUP INC.

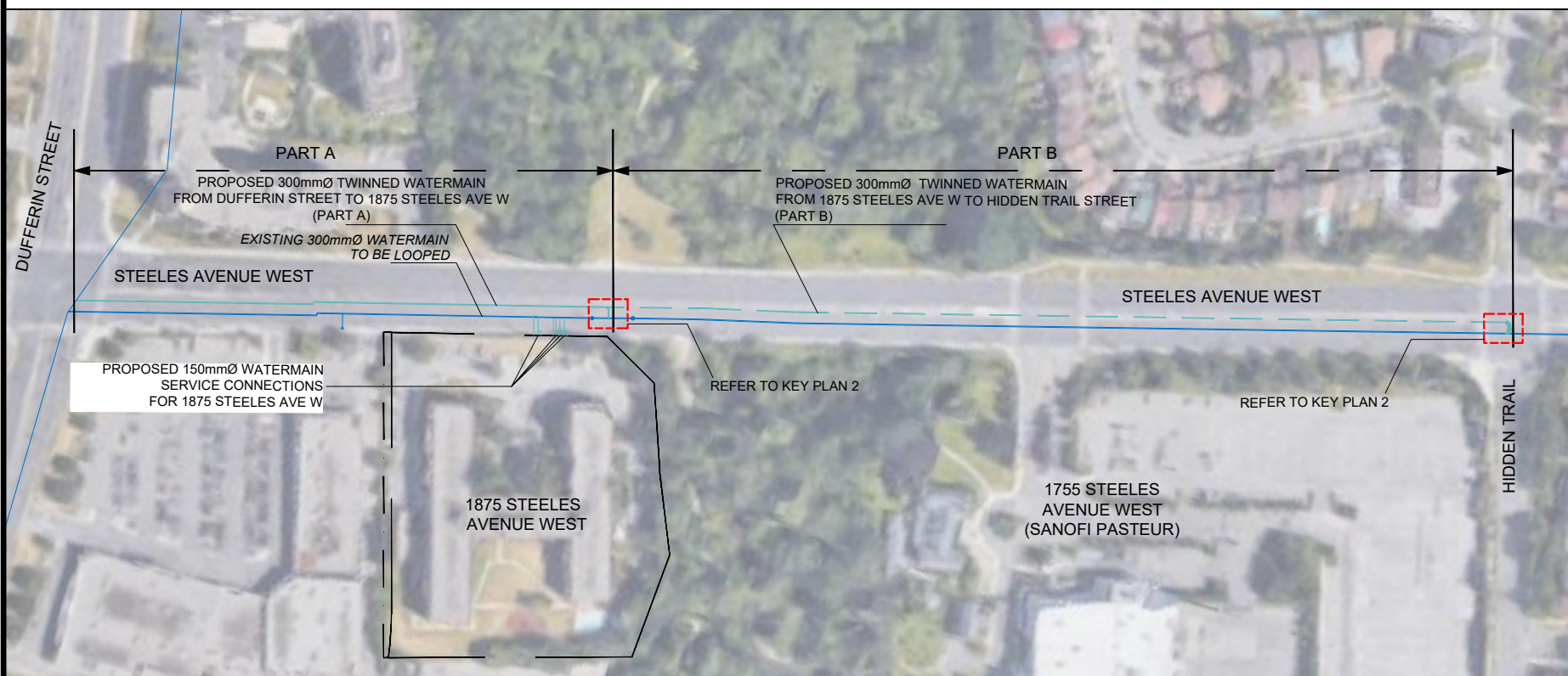


Nick Moutzouris, P.Eng.
Principal

Encl: Appendix A – Key Plans

APPENDIX A

Key Plans



SCALE N.T.S.



150 Bermondsey Road, Toronto, Ontario M4A 1Y1

KEY PLAN 1
1875 STEELES STREET
TORONTO, ONTARIO

DATE: JULY 2024

SCALE: N.T.S.

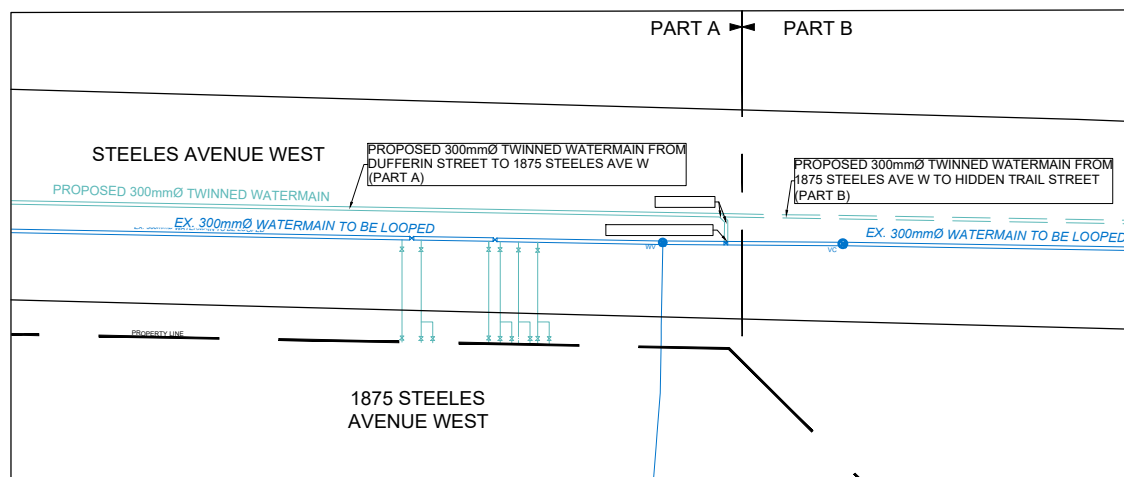
PROJECT No: UD20-025

FIGURE No: KP- 01

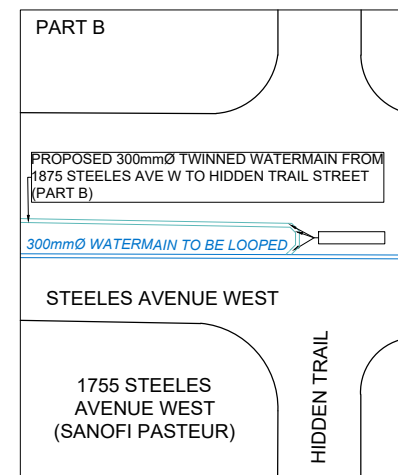
LEGEND

- EXISTING PROPERTY LINE
- PROPOSED PROPERTY LINE
- EXISTING WATER
- PROPOSED WATER
- PROPOSED FIRE HYDRANT





WATERMAIN LOOP DETAIL - PART A
(UP TO 1875 STEELES AVE. W.)
SCALE N.T.S



WATERMAIN LOOP DETAIL - PART B
(UP TO 1755 STEELES AVE. W.)
SCALE N.T.S



150 Bermondsey Road, Toronto, Ontario M4A 1Y1

KEY PLAN 2
1875 STEELES STREET
TORONTO, ONTARIO

DATE: JULY 2024

SCALE: N.T.S.

PROJECT No: UD20-025

FIGURE No: KP- 02

LEGEND

EXISTING PROPERTY LINE
PROPOSED PROPERTY LINE
EXISTING WATER
PROPOSED WATER
PROPOSED FIRE HYDRANT

